

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY TRAVIS FISHER,

Defendant.

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Case No. 4:24-cr-00177-DGK

**DEFENDANT’S MOTION FOR HEARING TO DISCUSS
U.S. PROBATION’S REQUEST FOR
MODIFICATION OF CONDITIONS OF RELEASE**

Defendant, John T. Fisher, by and through undersigned counsel, respectfully moves this Honorable Court for an order setting a hearing to discuss U.S. Probation’s request for a modification of the conditions of release. In support of this request, Defendant states the following:

1. Procedural History

Mr. Fisher was released on a recognizance bond with conditions set by Magistrate Judge Jill A. Morris on August 23, 2024. Defendant has remained compliant with these conditions since that time.

2. Probation’s Request for Modification

On or about September 6, 2024, U.S. Probation for the Northern District of Oklahoma sent a request to the Western District of Missouri USPO requesting modification of Defendant’s conditions of release. The proposed modifications included:

- Defendant shall not have any contact, directly or indirectly, with a member or associate of any Outlaw Motorcycle Gang. Any unauthorized contact should be reported immediately to the United States Probation Office. Defendant shall not

participate or in any way engage in activities related to furthering or promoting the Pagan's Outlaw Motorcycle Gang, and all other Outlaw Motorcycle Gangs.

- Successfully participate in a program of testing for drug and alcohol abuse, as directed by the United States Probation Office. Testing may be used with random frequency, not to exceed eight times per month, and may include urine testing, the wearing of a sweat patch, oral swab, and/or any other form of substance abuse testing and/or screening. The defendant must not obstruct, attempt to obstruct, or tamper with the efficiency and accuracy of substance abuse testing and/or screening.
- Participate in weekly counseling sessions as directed by the USPO.

Counsel for the defendant, the government, and the USPO have all been in joint communication with each other on the issues in question, which included phone calls and numerous email exchanges. Some of the conditions are deemed unnecessary and others may require further modification by this Court.

3. Need for Hearing

Mr. Fisher respectfully requests that this Court set a hearing to discuss the proposed modifications, as they could impose significant new obligations that impact Defendant's ability to maintain stable employment and/or are unnecessary. Defendant seeks clarification and further discussion regarding the necessity and appropriateness of these proposed changes.

4. Defendant's Compliance and Cooperation

Mr. Fisher has remained in full compliance with all existing conditions of release and has cooperated with U.S. Probation throughout this case. As such, he believes that a hearing is necessary to ensure that any modifications are both reasonable and in line with the goals of pretrial supervision.

WHEREFORE, Defendant respectfully requests that this Court schedule a hearing to discuss U.S. Probation's request for modification of Defendant's conditions of release, and for such other and further relief as the Court deems just and proper.

Date: October 3, 2024

Respectfully Submitted,

/s/ Shazzie Naseem

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Counsel for Defendant John T. Fisher

CERTIFICATE OF SERVICE

I certify that on October 3, 2024, this Motion was electronically filed with the clerk of the court by using the CM/ECF system which will send a notice of electronic filing to all parties.

/s/ Shazzie Naseem

Attorney for Defendant John T. Fisher